

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLACKROCK CORE BOND
PORTFOLIO, et al.,

Plaintiffs,

v.

U.S. BANK NATIONAL ASSOCIATION,

Defendant.

Case No. 14-cv-09401-PGG

**NOTICE OF PLAINTIFFS' RENEWED MOTION FOR CLASS CERTIFICATION
AND APPOINTMENT OF CLASS REPRESENTATIVES AND CLASS COUNSEL**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(a), 23(b)(3) and 23(g), Plaintiffs hereby move this Court before the Honorable Paul G. Gardephe for an Order: (i) certifying a class of all individuals who purchased or otherwise acquired a beneficial interest in a security issued from the Trusts identified in Exhibit 2 to the supporting declaration of Timothy A. DeLange between the date of offering and 60 days from the final order certifying the class and who hold that beneficial interest in the security through the date of final judgment in the District Court, and who were damaged as a result of Defendant U.S. Bank, National Association's ("U.S. Bank" or "Defendant") alleged breaches of contract and violations of the Trust Indenture Act of 1939 ("TIA") (collectively, the "Class");¹ (ii) appointing Plaintiffs as Class Representatives for

¹ Excluded from the Class are the Defendant, the Originators, the Sellers, the Master Servicers and the Servicers to the Trusts, and their officers and directors, their legal representatives, successors or assigns, and any entity in which they have or had a controlling interest.

the respective Trusts in which they hold notes; and (iii) appointing Bernstein Litowitz Berger & Grossmann LLP (“Bernstein Litowitz”) Class counsel.

The Motion is based upon the accompanying Memorandum of Law in Support of Plaintiffs’ Renewed Motion for Class Certification and Appointment of Class Representatives and Class Counsel, the Declaration of Timothy A. DeLange, and the exhibits thereto, and upon all of the proceedings and papers filed herein.

Dated: June 21, 2017

BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP

/s/Timothy A. DeLange
TIMOTHY A. DeLANGE

BLAIR A. NICHOLAS (admitted *pro hac vice*)
TIMOTHY A. DELANGE (admitted *pro hac vice*)
BENJAMIN GALDSTON (admitted *pro hac vice*)
BRETT M. MIDDLETON (admitted *pro hac vice*)
RICHARD D. GLUCK (admitted *pro hac vice*)
LUCAS E. GILMORE (admitted *pro hac vice*)
ROBERT S. TRISOTTO
12481 High Bluff Drive, Suite 300
San Diego, CA 92130
Tel: (858) 793-0070
Fax: (858) 793-0323

Counsel for Plaintiffs and the Proposed Class